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BEFORE THE ARIZONA CORPORATION COMMISSION

2006 JUN -1 A 4: 38

COMMISSIONERS

Jeff Hatch-Miller, Chairman

William A. Mundell

Marc Spitzer

Mike Gleason

Kristin K. Mayes

Arizona Corporation Commission
AZ CORP COMMISSION
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JUN 01 2006

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RB

IN THE MATTER OF THE APPLICATION OF
ARIZONA WATER COMPANY, AN ARIZONA
CORPORATION, TO EXEND ITS EXISTING
CERTIFICATE OF CONVENIENCE AND
NECESSITY IN THE CITY OF CASA GRANDE
AND IN PINAL COUNTY, ARIZONA

Docket No. W-01445A-06-0199

IN THE MATTER OF THE APPLICATION OF
PALO VERDE UTILITIES COMPANY FOR AN
EXTENSION OF ITS EXISTING CERTIFICATE
OF CONVENIENCE AND NECESSITY.

Docket No. SW-03575A-05-0926

IN THE MATTER OF THE APPLICATION OF
SANTA CRUZ WATER COMPANY FOR AN
EXTENSION OF ITS EXISTING CERTIFICATE
OF CONVENIENCE AND NECESSITY.

Docket No. W-03576A-05-0926

**GLOBAL'S RESPONSE IN SUPPORT OF
THE MOTION TO INTERVENE BY
THE ROBSON UTILITIES**

Santa Cruz Water Company, LLC; Palo Verde Utilities Company, LLC; Global Water –
Santa Cruz Water Company and Global Water – Palo Verde Utilities Company (collectively,
“Global”) hereby respond in support of the Motion to Intervene filed by the Robson Utilities on
May 18, 2006. The sweeping application filed by Arizona Water Company (“AWC”) covers more
than a hundred square miles of Pinal County, and presents vitally important questions that will
impact the future of Pinal County for generations to come. Some of these important questions are:

1 (1) Should a utility be allowed to undertake a vast land grab without support from
2 landowners or local governments? Here, AWC has submitted requests for
3 service directed to it for less than 3/10 of 1% of the area it requested, as Global
4 noted in its letter filed April 7, 2006.

5 (2) Where will the water come from? AWC does not have a Designation of
6 Assured Water Supply ("DAWS"), and it has not submitted a Certificate of
7 Assured Water Supply ("CAWS"). Should a DAWS be required? And if not,
8 should a CAWS be required? If groundwater will be used, what effect will the
9 withdrawal of groundwater to support 100 square miles have on other providers
10 such as Global and Robson?

11 (3) Given that AWC's application covers only water service, how will wastewater
12 service be provided? Is AWC proposing the use of septic systems for such a
13 vast area? If so, what would the environmental effects be on Pinal County?

14 (4) Are integrated water, wastewater, and reclaimed water service superior to stand-
15 alone water-only service, as the Commission found in the Woodruff case,
16 Decision No. 68453 (Feb. 22, 2006)? Should the use of reclaimed water be
17 encouraged to reduce usage of groundwater?

18 These important issues are raised by AWC's application. The entire Pinal County area, including
19 Robson, will be affected by the Commission's resolution of these issues. Further, Robson's
20 experience with regard to these matters will be helpful in helping develop a record. Accordingly,
21 Global recommends that the Motion to Intervene of the Robson Utilities be granted.

1 RESPECTFULLY SUBMITTED this 1st day of June 2006.

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3 ROSHKA DEWULF & PATTEN, PLC

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5 By 

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16 Copies of the foregoing hand-delivered/mailed
17 this 1st day of June 2006, to:

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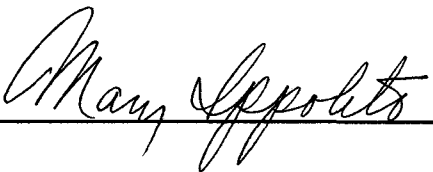
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